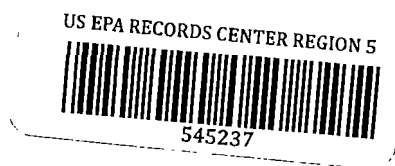


I. HEADING

Date: June 30, 1996



Subject: Pollution Report for the OPA Removal Action at the
Nacelle Land Management site, Painesville Twp.,
Lake County, Ohio.

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POLREP NO. 41 (Initial)

II. BACKGROUND:

Site NO:	FPN#096026
BOA Contract No:	DTCG8491A90007
Response Authority:	OPA
State Notification	OEPA
Start Date:	06/28/95
Completion Date:	

III. SITE INFORMATION:

A. Incident Category

OPA Incident Category: Waste Oil/Brine Facility

B. Site Description

1. Site Location: The Nacelle Land Management Corporation (NLMC) site is located at 675 Lakeshore Boulevard,

Painesville Township, Lake County, Ohio. Nacelle maintains a 12-million gallon surface impoundment, brine injection well and storage tanks and containers. Nacelle was incorporated in Ohio in 1979 and accepted oil and brine from oil field producers. The site is located in a rural area and is situated on two adjacent parcels of land in close proximity to the Mentor Marsh. One parcel, 23 acres in size, is owned by Nacelle and the other 50 acre parcel is owned by Lake Underground Storage.

Previous investigations by state and local officials have documented oil releases from the surface impoundment to the unnamed tributary to Mentor Marsh and to Mentor Marsh itself. The U.S. Fish and Wildlife Service has observed up to 60 birds covered with oil from the surface impoundment at the facility. As of June 1996, U.S. EPA estimated that the surface impoundment contained 290,000 gallons of surface oil; 10,000,000 gallons of brine and water; and 2,840,000 gallons of oil sludge. The most recent spill event from the surface impoundment occurred on June 18 and 26, 1996, resulting in the release of an estimated 50,000 to 100,000 gallons of oil and brine to the unnamed tributary and Mentor Marsh.

The facility also has 8 aboveground storage tanks with a total capacity of 148,000 gallons. This includes 4 former propane storage tanks (each with a 30,000 gallon capacity), two deteriorated road tankers and one aboveground storage tank adjacent to the surface impoundment. In June 1996, a total of 35,000 gallons of oil from the impoundment was stored in the aboveground storage tanks. The facility does not have a written Spill Prevention Control and Countermeasures Plan (SPCC) for these tanks as required under 40 C.F.R Part 112 and as documented by a U.S.EPA inspection conducted on June 19, 1996.

2. Description of Threat: The 12 million gallon impoundment was documented on June 10, 1996, to have 2 inches of free board at the surface. Heavy rains during the last weeks continue to reduce the free board and contribute to the threat of a release into the unnamed tributary and the Mentor Marsh. On June 18 and 26, 1996 OSC

Renninger and Painesville Township Fire Department (PTFD) observed releases from the impoundment into the unnamed tributary to the Mentor Marsh from a notch that was cut into the side of the impoundment.

C. Preliminary Assessment/Site Inspection Results

On November 18, 1995, the Ohio Environmental Protection Agency (OEPA) responded to a release of oil and brine from the surface impoundment at the Facility. The OEPA OSC discovered approximately 8,000 gallons of oil and brine were released into the unnamed tributary to Mentor Marsh. The USCG investigated the incident.

On May 24, 1996, U.S. EPA notified Joseph Berick, Nacelle and Lake Underground of their liability for cleanup of the oil at the facility and requesting notification of a voluntary cleanup. Nacelle did not initiate the cleanup activities requested by the U.S. EPA.

On June 17, 1996, U.S. EPA issued Nacelle Corp. and Joseph Berick (President) an Administrative Order to initiate an oil removal action at the oil impoundment due to continuing threat of release to Mentor Marsh. Nacelle did not initiate a removal action within the three day deadline and denied site access to U.S. EPA to initiate response actions.

June 18, 1996, PTFD observed and documented the surface impoundment discharging oil and brine to the unnamed tributary to Mentor Marsh following a heavy rain. An estimated 50,000 to 100,000 gallons overflowed from the oil surface impoundment. PTFD also documented 3 oil contaminated geese adjacent to the oil impoundment.

On June 19, 1996, an SPCC inspection of the Nacelle Land Management facility was conducted by the U.S. EPA. U.S. EPA documented that the facility did not have a written SPCC Plan for the Nacelle facility. The June 18, 1996, oil spill was not reported to the National Response Center (NRC). The 12 million gallon oil/brine impoundment was observed to be at capacity with visible oil on an unnamed tributary to Mentor Marsh.

IV RESPONSE INFORMATION:

A. Situation

1. Current Situation: Following assistance from the DOJ, Nacelle agreed on June 27, 1996, to U.S. EPA access. OPA removal Action initiated on June 28, 1996 to stabilize and complete off-site disposal/recycling of oil and oil saturated soils at the site. OSC Renninger, START, and Samsel Services currently on site.

2. Removal Activities to Date:

June 24, 1996 - Authorization to Proceed issued to Samsel Services Company. Federal Project Number assigned 096026. OSC holds site organizational meeting with START, and Samsel Services (Coast Guard BOA contractor). Site contingency plan and safety plan drafted.

June 26, 1996 - OSC and RM conduct initial site walkthrough with PTFD. Observe leaking oil from the notch area of the impoundment spilling into the un-named tributary. PTFD contained the release by shoveling soil into the release point of the impoundment.

June 27, 1996 - Following assistance from DOJ, Nacelle agreed to U.S. EPA access for a 30 day period to conduct an oil removal action.

June 28, 1996 - Personnel and equipment mobilized to site. Command post and support zone established. Decontamination and truck pad prepared as a recovery point. Site security established. Recovery of localized oil spill initiated. Sorbent booms placed in unnamed tributary to Mentor Marsh above and below the notch. Available oils removed from the boxes on site. Contained surface oil on impoundment toward recovery equipment in northwest corner of the impoundment with skirt boom. Lake County Metropolitan Parks Animal Care Specialist rescue 3 oil soaked Canada Geese from the impoundment for rehabilitation.

June 29, 1996 - Decontamination and truck pad are continued to be prepared as recovery point for 3 vacuum

trucks. Oil saturated soils are excavated and staged in the soil staging area. Oil recovery operations on the impoundment are initiated with 3 vacuum trucks.

June 30, 1996 - Oil recovery operations on the surface impoundment continue. Begin construction of a loading platform to be used for tanker truck loading operations. Approximately 10,000 gallons of oil recovered from surface impoundment.

3. Enforcement:

DOJ prepared to file a temporary restraining order against Nacelle to provide U.S. EPA site access.

B. Next Steps

- Continue oil recovery from oil surface impoundment.
- Initiate off-site disposal of oil by 7/1/96.

C. Key Issues

- Prevent any further entrapment of migratory waterfowl during oil recovery.

V. COST INFORMATION

Estimate Through June 28, 1996

	Budget	Cost to Date	Remaining
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Samsel	\$175,000	\$21,914.90	\$153,085.10
START	\$ 20,000	\$ 3,148.00	\$ 16,852.00
EPA Direct	\$ 5,000	\$ 1,320.00	\$ 3,680.00
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Total	\$200,000	\$26,382.90	\$173,617.10